

UNITED STATES DISTRICT COURT
DISTRICT OF IDAHO

UNITED STATES OF AMERICA

WARRANT FOR ARREST

v.

RYAN M TICHY

1:20-cr-00140-DCN

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest **RYAN M TICHY** and bring forthwith to the
nearest magistrate judge to answer an **INDICTMENT** charging with the below listed violations.

18 U.S.C. § 1343 WIRE FRAUD
18 U.S.C. § 1028A AGGRAVATED IDENTITY THEFT
42 U.S.C. § 408(a)(7)(B) FALSE REPRESENTATION OF A SOCIAL SECURITY NUMBER



United States Courts
District of Idaho
ISSUED
Crystal Hall
on Jul 15, 2020 9:37 am

Crystal Hall, Deputy Clerk

July 15, 2020

Name and Title of Issuing Officer

Date

RETURN

This warrant was received _____ and executed with the arrest of the above-name
individual at _____.

Signature of Arresting Officer

Date of Arrest

Name & Title of Arresting Officer

BART M. DAVIS, IDAHO STATE BAR NO. 2696
UNITED STATES ATTORNEY
DARCI W. CRANE, IDAHO STATE BAR NO. 8852
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF IDAHO
1290 W. MYRTLE ST. SUITE 500
BOISE, ID 83702-7788
TELEPHONE: (208) 334-1211
FACSIMILE: (208) 334-1413

U.S. COURTS

JUL 14 2020

Rcvd _____ Filed _____ Time _____
STEPHEN W. KENYON
CLERK, DISTRICT OF IDAHO

UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF IDAHO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RYAN M TICHY,

Defendant.

Case No.

CR 20-0140-SDCN

INDICTMENT

18 U.S.C. § 1343
18 U.S.C. § 1028A
42 U.S.C. § 408(a)(7)(B)
18 U.S.C. § 981(a)(1)(C)
28 U.S.C. § 2461(c)
18 U.S.C. § 982(a)

The Grand Jury charges:

COUNTS ONE THROUGH FIVE

**Wire Fraud
18 U.S.C. § 1343**

1. On a date unknown, but from at least May 2018 to in or about December 2019, in the District of Idaho and elsewhere, the defendant, RYAN M TICHY, knowingly devised, participated in, and intended to devise a scheme and plan to defraud, individuals, retail

merchants, and financial institutions, as to material matters and to obtain money and property by means of materially false and fraudulent pretenses, representations, and promises.

Manner and Means

2. In order to further the objects and goals of the scheme, the defendant, RYAN M TICHY, used the following manner and means, among others:
3. TICHY obtained the means of identification of an unknown number of specific, individual victims, including their names, social security numbers, dates of birth, and account numbers.
4. TICHY obtained false identification documents, including counterfeit driver's licenses with victim's names but with his photograph.
5. TICHY obtained existing credit account information for individual victims.
6. TICHY applied for, and sometimes successfully obtained, credit and loan accounts using other individuals' means of identification.
7. TICHY used the fraudulently created and stolen credit and loan accounts to make purchases at different retail merchants, hotels, and other places of business.
8. TICHY travelled around Washington and to Idaho, Oregon, Nevada, and elsewhere, to make fraudulent purchases.

Executions of the Scheme

9. On or about the dates listed below, in the District of Idaho and elsewhere, the defendant, RYAN M TICHY, for the purpose of executing the scheme described above, and attempting to do so, caused to be transmitted by means of wire communication in

interstate commerce the signals and sounds described below, each transmission constituting a separate count of this Indictment:

| Count | Date | Location | Account used | Amount (Approx.) |
|-------|-----------|--|------------------------|------------------|
| 1 | 2/12/2019 | Bobbi Bullock Medical Esthetics, 1112 W Main St., Boise, ID | account ending 4861 | \$2,501.25 |
| 2 | 3/27/2019 | Bretz R.V. & Marine, 4180 S Broadway Ave., Boise, ID | loan application | \$14,387.00 |
| 3 | 4/2/2019 | Bretz R.V. & Marine, 4180 S Broadway Ave., Boise, ID | account ending 0501 | \$1,216.69 |
| 4 | 4/1/2019 | Campbell Tractor Company, 2014 N Franklin Blvd., Nampa, ID | account ending 7795 | \$2,118.48 |
| 5 | 11/4/2019 | Sportsman's Warehouse, 3797 E. Fairview Ave., Meridian, ID | account ending 0996 | \$1,000 |

All in violation of Title 18, United States Code, Section 1343.

COUNTS SIX THROUGH ^{NINE}~~TEN~~

TWM
7/14/2020

**Aggravated Identity Theft
18 U.S.C. § 1028A**

10. Paragraphs 1 through 9 of this Indictment are realleged and incorporated by reference as though fully set forth herein.
11. On or about the dates listed below, in the District of Idaho and elsewhere, the defendant, RYAN M TICHY, did knowingly and willfully transfer, possess, and use without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), knowing that the means of identification belonged to another actual person, described below for each count:

| Count | Underlying Count | Victim Initials | Date of Use | Means of Identification |
|-------|------------------|-----------------|--------------------|-------------------------|
| 6 | 1 | C.M. | 2/8/2019 | Name, DOB |
| 7 | 2 | J.B. | 3/27/2019-4/2/2019 | Name, DOB, SSN |
| 8 | 4 | J.B. | 4/1/2019 | Name, DOB, SSN |
| 9 | 5 | M.L. | 11/4/2019 | Name, DOB, SSN |

All in violation of Title 18, United States Code, Section 1028A.

COUNT TEN

False Representation of a Social Security Number 42 U.S.C. § 408(a)(7)(B)

On or about March 27, 2019, in the District of Idaho and elsewhere, the defendant, RYAN M TICHY, for the purpose of obtaining something of value and for any other purpose, with the intent to deceive, falsely represented XXX-XX-1894, to be the social security account number assigned by the Commissioner of Social Security to him in an application at Bretz R.V. and Marine, located in Boise, Idaho, for credit, when in fact, such number was not the social security account number assigned to the defendant by the Commissioner of Social Security, all in violation of Title 42, United States Code 408(a)(7)(B).

COUNT ELEVEN

False Representation of a Social Security Number 42 U.S.C. § 408(a)(7)(B)

On or about November 4, 2019, in the District of Idaho and elsewhere, the defendant, RYAN M TICHY, for the purpose of obtaining something of value and for any other purpose, with the intent to deceive, falsely represented XXX-XX-3662 to be the social security account number assigned by the Commissioner of Social Security to him in an application for credit associated with Sportsman's Warehouse, located in Meridian, Idaho, when in fact, such number was not the

social security account number assigned to the defendant by the Commissioner of Social Security, all in violation of Title 42, United States Code 408(a)(7)(B).

CRIMINAL FORFEITURE ALLEGATION

**Wire Fraud Forfeiture
18 U.S.C. § 981(a)(1)(C)/28 U.S.C. § 2461(c)/18 U.S.C. § 982(a)**

Upon conviction of the offenses alleged in Counts One through Five of this Indictment, the defendant, RYAN M TICHY, shall forfeit to the United States any and all property, real and personal, tangible and intangible, consisting or derived from any proceeds the said defendant obtained directly or indirectly as a result of the foregoing offenses. The property to be forfeited includes, but is not limited to, the following:

1. Unrecovered Cash Proceeds. The defendant obtained and controlled unrecovered proceeds of the offense of conviction, or property derived from or traceable to such proceeds, and property the defendant used to facilitate the offense, but based upon actions of the defendant, the property was transferred, diminished, commingled, or is otherwise unavailable.

2. Substitute Assets. Pursuant to 21 U.S.C. § 853(p) and other applicable statutes, the government will seek forfeiture of substitute assets, “or any other property of the defendant” up to the value of the defendant’s assets subject to forfeiture. The government will do so when the property subject to forfeiture cannot be forfeited for one or more of the following reasons:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third person;
- c. Has been placed beyond the jurisdiction of the court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property which cannot be subdivided without difficulty.

Dated this 14th day of July, 2020.

A TRUE BILL

/s/ [signature on reverse]

FOREPERSON

BART M. DAVIS
UNITED STATES ATTORNEY
By:



DARCI W. CRANE
ASSISTANT UNITED STATES ATTORNEY

CRIMINAL COVERSHEETDEFENDANT'S NAME: **Ryan M. Tichy**

DEFENSE ATTORNEY:

Address:

U.S. COURTS**JUL 14 2020**Telephone No.: **Rcvd _____ Filed _____ Time _____**
STEPHEN W. KENYON
CLERK, DISTRICT OF IDAHO

JUVENILE: No

PUBLIC or SEALED: Sealed

SERVICE TYPE: Warrant

(Summons or Warrant or
Notice (if Superseding))

ISSUE: Yes

INVESTIGATIVE AGENT: Matt Lavelle

Telephone No.: (208) 423-4287

AGENCY: Social Security
Administration/OIG

INTERPRETER: No

If YES, language:

CASE INFORMATION:

RELATED COMPLAINT: No

CASE NUMBER:

CR 20-0140-SDCN**CRIMINAL CHARGING INFORMATION**CHARGING DOCUMENT: **Indictment**Felony: **Yes**County of Offense: **Ada**Class A Misdemeanor: **No**Estimated Trial Time: **5 days**Class B or C Misdemeanor: **No**
(Petty Offense)

| STATUTE (Title and Section(s)) | COUNT/ FORFEITURE ALLEGATION | BRIEF DESCRIPTION | PENALTIES (Include Supervised Release and Special Assessment) |
|--|------------------------------------|---|---|
| 18 U.S.C. § 1343 | ONE through FIVE | Wire Fraud | 20 years, not more than 3 years Supervised Release, \$250,000 fine, \$100 Special Assessment |
| 18 U.S.C. § 1028A | SIX through NINE | Aggravated Identity Theft | Mandatory minimum of 2 years imprisonment consecutive to other non- 1028A sentence, 1 year Supervised Release, \$250,000 Fine, \$100 Special Assessment |
| 42 U.S.C. § 408(a)(7)(B) | TEN and ELEVEN | Fraudulent Representation of a Social Security Number | 5 years, 3 years Supervised Release, \$250,000 Fine, \$100 Special Assessment |
| 18 U.S.C. § 981(a)(1)(C), 982(a); 28 U.S.C. 2461(c) | Forfeiture Allegation | Wire Fraud Forfeiture | Forfeiture of Listed Property. |

Date: 14 July 2020Assistant U.S. Attorney: DARCI W. CRANETelephone No.: (208) 334-1211